

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SAFA SAFA,

Plaintiff,

Case No. 2:17-cv-13809

v.

HON. MARK A. GOLDSMITH

JP MORGAN CHASE BANK, N.A.,

Defendant.

**STIPULATION AND ORDER FOR STRIKING ALL REFERENCES TO
JPMORGAN CHASE BANK, N.A. AND AN EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Defendant, Chase Bank USA, N.A. (“Chase”) (incorrectly named herein as JP Morgan Chase Bank, N.A.) and Plaintiff, Safa Safa (“Safa”), without waiving any claims or defenses, hereby submit this stipulation and proposed agreed order (“Stipulated Order”) seeking to (1) strike all references to JP Morgan Chase Bank, N.A. in this matter, including in the caption and Complaint, and replace them with Chase Bank USA, N.A.; and, (2) provide Chase an extension of time to respond to Plaintiff’s Complaint, through and including January 19, 2018. In support thereof, the parties, in agreement, respectfully state as follows:

WHEREAS, without the parties waiving any claims or defenses, JP Morgan Chase Bank, N.A. is not a proper party in interest to this lawsuit, but rather Chase

Bank USA, N.A., given that the Plaintiff's relationship with Chase arises from a credit card account;

WHEREAS, the parties propose the Court strike all references to JP Morgan Chase Bank, N.A. in this matter and replace them with Chase Bank USA, N.A., as the most expeditious manner to proceed with the litigation;

WHEREAS, on or about November 28, 2017, Chase was served with the Complaint, which otherwise would impose a deadline to respond to the Complaint on December 19, 2017; and,

WHEREAS, in light of all the foregoing, as well as the upcoming holidays, the fact that Chase has neither asked for nor received any prior extensions, and that the relief requested herein will not cause any prejudice to any party, the parties have agreed to allow Chase an extension of time, through and including January 19, 2018, to respond to the Complaint.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN CHASE AND SAFA, AND IT IS HEREBY ORDERED BY THE COURT, as follows:

- (1) All references to JP Morgan Chase Bank, N.A. are hereby stricken in this matter, without prejudice, including in the caption and the Complaint, and replaced with Chase Bank USA, N.A.;
- (2) The Clerk is hereby instructed to make the changes accordingly to the

caption and the docket, and the Clerk shall terminate JP Morgan Chase Bank, N.A. as a party to these proceedings;

(3) Chase shall have through and including January 19, 2018 to answer, move, or otherwise plead in response to the Complaint.

SO ORDERED.

Dated: December 18, 2017
Detroit, Michigan

s/Mark A. Goldsmith
MARK A. GOLDSMITH
United States District Judge

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or First Class U.S. mail addresses disclosed on the Notice of Electronic Filing on December 18, 2017.

s/Karri Sandusky
Case Manager

/s/ Tarek N. Chami (with permission)
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Dated: December 18, 2017

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Dated: December 18, 2017